

HEARING DATE & TIME: To be determined
OBJECTION DEADLINE: To be determined

William P. Weintraub
Gregory W. Fox
GOODWIN PROCTER LLP
The New York Times Building
620 Eighth Avenue
New York, New York 10018
T: 212-813-8800
E: wwaintraub@goodwinlaw.com
E: gfox@goodwinlaw.com

Counsel for Pre-Closing Accident Plaintiffs
Represented by Hilliard Martinez Gonzales
L.L.P. and The Law Offices of Thomas J. Henry
Listed on Exhibit A to the Motion

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:	:	Chapter 11
MOTORS LIQUIDATION COMPANY, et al.,	:	Case No.: 09-50026 (MG)
f/k/a General Motors Corp., et al.,	:	
	:	
Debtors.	:	(Jointly Administered)
-----X		

**NOTICE OF SUPPLEMENTAL OMNIBUS MOTION BY
CERTAIN PRE-CLOSING ACCIDENT PLAINTIFFS FOR AUTHORITY
TO FILE LATE PROOFS OF CLAIM FOR PERSONAL INJURIES AND
WRONGFUL DEATHS IN CONNECTION WITH SETTLEMENT WITH
THE MOTORS LIQUIDATION COMPANY GUC TRUST**

PLEASE TAKE NOTICE that upon the annexed *Supplemental Omnibus Motion by
Certain Pre-Closing Accident Plaintiffs for Authority to File Late Proofs of Claim for Personal
Injuries and Wrongful Deaths*, dated May 25, 2018 (the "Motion"), the undersigned counsel will
move the Bankruptcy Court for an order approving the settlement of the late claims attached to
the Motion as Exhibit B as part of (1) *the Motion of Motors Liquidation Company GUC Trust to*

Approve (I) the GUC Trust Administrator's Actions and (II) the Settlement Agreement by and Among the Signatory Plaintiffs and the GUC Trust Pursuant to Bankruptcy Code Sections 105, 363, and 1142 and Bankruptcy Rules 3002 and 9019, and (III) Authorize the Reallocation of GUC Trust Assets filed on May 3, 2018 [Dkt. No. 14293] (the "GUC Trust Settlement Motion"); and (2) *Motion of Motors Liquidation Company GUC Trust to Estimate Vehicle Recall Economic Loss and Personal Injury Claims for Allowance Purposes and to Establish a Schedule for the Claims Estimation Proceeding* filed on May 3, 2018 [Dkt. No. 12494] (the "Estimation Motion") and, together with the GUC Trust Settlement Motion, the "GUC Trust Settlement").

PLEASE TAKE FURTHER NOTICE that the hearing date and time and the objection deadline with respect to the Motion shall be set for the same hearing date and time and same objection deadline as for the GUC Trust Settlement Motion.

Dated: May 25, 2018

Respectfully submitted,

/s/ William P. Weintraub

William P. Weintraub
Gregory W. Fox
GOODWIN PROCTER LLP
The New York Times Building
620 Eighth Avenue
New York, NY 10018
Tel.: 212.813.8800
Fax: 212.355.3333
wweintraub@goodwinlaw.com
gfox@goodwinlaw.com

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